

EXHIBIT A

EXHIBIT A**PLAINTIFFS' INTERROGATORIES SERVED ON APRIL 3, 2024
SEEKING DISCOVERY-ON-DISCOVERY**

Interrogatory	Text of Interrogatory
Interrogatory No. 29	Describe whether and how You can determine or track if a custodian identified in this matter has engaged or changed the “history on” or “history off” settings options for a Chat from the period from January 1, 2015 to the present. To the extent You can determine or track that information, (a) identify which custodians have turned “history on” for a Chat during the relevant time period, and when they did so, or, to the extent You cannot determine or track that information, (b) provide answers from those custodians as to whether and when they have ever personally turned “history on” for a Chat during the relevant time period.
Interrogatory No. 30	Describe the process by which Chats are retained and stored, or disposed of if they are not designated to be retained, including the time periods, processes, programs, and employees (by name and position) involved.
Interrogatory No. 31	Provide the start and end dates for any legal holds applicable to any custodian identified in this matter from January 1, 2015 to the present.
Interrogatory No. 32	Explain the ‘history on’ and ‘history off’ Chats settings options available to the custodians identified in this matter from January 1, 2015 to the present, including (a) how the settings options affected Chats retention policies, (b) how those settings options changed over time, (c) whether and when any identified custodian had the ability to engage the ‘history off’ settings option, and (d) when that ‘history off’ settings option was removed, if ever. If the ‘history off’ Chats setting option was ever removed for any custodians identified in this matter, (e) provide the date it was removed for each, (f) explain whether any Chats that were started or created before that removal date still have the settings option to turn ‘history off,’ and (g) explain whether any Chats that already existed and had the “history off” settings option engaged at the time the settings option was removed were switched or changed, either manually or automatically, to the ‘history on’ settings option.
Interrogatory No. 33	Identify the employees (by name and position) who were and are responsible for drafting, setting, and/or enforcing Your Chats retention policies, procedures, and practices and Your litigation holds from January 1, 2015 to the present.

Interrogatory	Text of Interrogatory
Interrogatory No. 34	Identify whether each custodian identified in this matter ever sent or received Chats from January 1, 2015 to the present, and if they did, identify the number of Chats sent and received by each custodian during that period.